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 12 Attorneys for Defendant, Full Spectrum Laser LLC

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 FREDERICK SCOTT FISCHER, ) Case No. 2:20-cv-00339-APG-DJA  
 11 )  
 12 Plaintiff, ) **STIPULATION AND ORDER TO**  
 13 v. ) **EXTEND DISCOVERY**  
 14 FULL SPECTUM LASER LLC, )  
 15 )  
 16 Defendant. )  
 17 \_\_\_\_\_

18 IT IS HEREBY STIPULATED AND AGREED, by and between the parties'  
 19 counsel of record, that discovery deadlines in the Scheduling Order (ECF No. 24) be  
 20 extended seventy (70) days as follows:

21	Discovery Deadline	September 17, 2021
22	Dispositive Motion Deadline	October 18, 2021
23	Joint Pretrial Order	November 17, 2021

24 This is the fifth request for an extension of these deadlines. The parties provide  
 25 the following information to the Court regarding the proposed extension of the  
 26 discovery deadline. The parties understand that this stipulation has been entered with  
 27 less than 21 days prior to the close of discovery, as required pursuant to LR 26-3. The  
 28 reason for the parties' inability to comply with this deadline is Defendant's counsel's  
 previously unforeseeable medical leave.

### ***Discovery Completed To Date***

2 The parties have exchanged initial disclosures and initial rounds of written  
3 discovery. While there is a pending motion to compel before the court, the parties have  
4 largely resolved a dispute concerning outstanding discovery responses. The parties have  
5 begun to schedule depositions, but Defense Counsel will be on a medical leave of  
6 absence until August 23, 2021.

### ***Remaining Discovery To Be Completed***

8           The parties anticipate finalizing a schedule for taking depositions after August  
9 23, 2021.

### ***Reasons Discovery Could Not Be Completed Within The Existing Deadline***

11 The parties continue to make progress in this matter, but their respective counsel  
12 have continued to experience various practice-centric delays correlative to the COVID-  
13 19 pandemic and, more specifically, its ongoing (and varying) impact on litigation in  
14 various courts. Counsel for one of the parties became personally ill with COVID-19  
15 early in this case, which set matters back. Since the most recent extension, counsel for  
16 both parties have been affected by personal events, including a marriage by Plaintiff's  
17 counsel, as well as a family emergency involving a missing minor child of Defendant's  
18 counsel. Most recently, Defendant's counsel will be on a medical leave until  
19 approximately August 23, 2021.

20 The parties recently have been able to deal with the personal milestones and  
21 emergencies and believe that this final extension will allow the parties to conduct  
22 depositions prior to the close of the proposed discovery period.

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1        This is the parties' fifth request for an extension of the discovery deadline date  
2 and is not made to delay this matter. Based upon the foregoing, the parties believe  
3 there is good cause for the requested extension.

4        Dated this 2nd day of July, 2021.

5

6 FISHER & PHILLIPS LLP

THE VERSTANDIG LAW FIRM, LLC

7

8 /s/ Lisa A. McClane, Esq.

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9 Maurice VerStandig, Esq.  
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10 *Attorney for Plaintiff*

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14 IT IS SO ORDERED:



15 UNITED STATES MAGISTRATE JUDGE

16 July 6, 2021

17 DATED

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